

201-14607



NCIC HPV

Sent by: Mary-Beth
Weaver

07/21/2003 10:10 AM

To: NCIC HPV, moran.matthew@epa.gov

cc:

cc:

Subject: Withdrawal of Hydroxymethanesulfonic Acid, Monosodium Salt (CAS# 870-72-4) from the EPA High Production Volume (HPV) Challenge Program



Ed Kordoski <Kordoski@SOCMA.com> on 07/17/2003 12:01:10 PM

To: oppt.ncic@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA
cc: Charles Tozzo <tozzo_c@konica.com>, Chris Bagley <cbagley@danchem.com>, Derek Guest <derek.guest@kodak.com>, Ian Blundell <Blundell_I@konica.com>, Mike Bauer <mbauer@fujihuntusa.com>, Tim Ringo <ringot@konica.com>, Jamie Hobson <hobsonjfxxxxx@msn.com>, Jessica Ross <Rossj@SOCMA.com>, Bob Foster <notoxusa@aol.com>

Subject: Withdrawal of Hydroxymethanesulfonic Acid, Monosodium Salt (CAS# 870-72-4) from the EPA High Production Volume (HPV) Challenge Program

SFBMA

Formaldehyde Bisulfite

Sodium

Manufacturers Association

1850 M Street, NW, Suite 700, Washington, DC 20036

(202) 721-4145 (202) 296-8120 fax

kordoskie@socma.com

July 17, 2003

RETURN RECEIPT REQUESTED VIA E-MAIL

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OPT CBIC
2003 JUL 21 PM 2:19

Marianne Lamont Horinko, Acting Administrator

U.S. Environmental Protection Agency

Post Office Box 1473

Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

**Withdrawal of Hydroxymethanesulfonic Acid, Monosodium Salt (CAS# 870-72-4) from
the EPA High Production Volume (HPV) Challenge Program**

Dear Acting Administrator Horinko:

The Sodium Formaldehyde Bisulfite Manufacturers Association (SFBMA) in association with the Synthetic Organic Chemical Manufacturers Association (SOCMA) and composed of DanChem Technologies, Incorporated (formally Hickson DanChem Corporation), Eastman Kodak Company, Fuji Hunt Photographic Chemicals, Inc., and Konica Graphic Imaging International, Inc. volunteered on April 25, 2001, to sponsor hydroxymethanesulfonic acid, monosodium salt (CAS# 870-72-4), also known as sodium formaldehyde bisulfite, as part of the HPV Challenge Program. On April 3, 2003, SFBMA presented its test plan to the EPA, which posted it on its website for comment.

The SFBMA represents the major manufacturers and importers of sodium formaldehyde bisulfite in the United States. In recent years the market for this product has been decreasing along with its profitability. In a letter to then EPA Administrator Whitman dated June 27, 2003 (attached) DanChem Technologies, Incorporated announced that it would no longer manufacture this material after December of this year. The end of this year was chosen to meet current contractual obligations. DanChem Technologies, Incorporated, which is the largest manufacturer of sodium formaldehyde bisulfite in the SFBMA also withdrew from the consortium.

With the withdrawal of DanChem Technologies, Incorporated from the SFBMA and the loss of its production volume, sodium formaldehyde bisulfite no longer meets the criteria for inclusion in the volunteer HPV Challenge Program. In fact, the remaining manufacturers account for much less than 400,000 pounds of this chemical and no where near the 1 million pound threshold required for inclusion in the program.

Therefore the Sodium Formaldehyde Bisulfite Manufacturers Association and its member companies formally withdraw from the voluntary HPV Challenge Program and ask that hydroxymethanesulfonic acid, monosodium salt (CAS# 870-72-4), also known as sodium formaldehyde bisulfite, be removed from the list.

If you or your staff have any questions or comments regarding our withdrawal, please feel free to contact me.

Sincerely,

Edward Kordoski, MBA, Ph.D.

Executive Director

cc: SFBMA Members

=====

Edward W. Kordoski, MBA, Ph.D.
Synthetic Organic Chemical Manufacturers Association
Executive Director, Association Management Center
1850 M Street NW
Suite 700
Washington, DC 20036-5810

Phone: (202) 721-4145

Fax: (202) 296-8120

E-mail: kordoskie@socma.com

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SFBMA Letter to the EPA Withdrawing from the HPV Challenge Program 7-17-2003.doc



SFBMA DanChem Letter to EPA Withdrawing from the HPV Challenge Program 6-27-2003.pdf



**Sodium Formaldehyde Bisulfite
Manufacturers Association**

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July 17, 2003

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Sincerely,

Edward Kordoski, MBA, Ph.D.
Executive Director

cc: SFBMA Members

Mark D. Boivin
President and CEO



DanChem Technologies, Inc.
P.O. Box 400
Danville, Virginia 24543

Tel: (434) 797 8103
Fax: (434) 799 2814
markb@danchem.com

June 27, 2003

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

**CERTIFIED MAIL -
RETURN RECEIPT
REQUESTED**

Attn: Chemical Right-to-Know Program

Dear Governor Whitman:

Due to a steady decline in the market demand for hydroxymethanesulfonic acid, monosodium salt (CAS# 870-72-4), DanChem Technologies, Inc. will no longer manufacture or supply this material. DanChem's production and sales of this product will end by December 31, 2003. Although we have voluntarily participated in the HPV Challenge as a member of the Sodium Formaldehyde Bisulfite Manufacturers Association (SFBMA), we are now withdrawing from this consortium. We will be informing our existing customers of this decision over the next few weeks.

Sincerely,

Mark D. Boivin
President and CEO

MDB:bjs

cc: Dr. Edward W. Kordoski, SFBMA